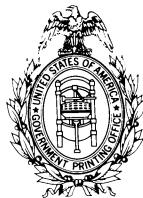




**Report on Improving the Controls  
over EEO Contract Investigations**

**March 2000**

**00-04**



Office of Audits



UNITED STATES GOVERNMENT PRINTING OFFICE  
OFFICE OF INSPECTOR GENERAL

# memorandum

DATE: March 30, 2000

REPLY TO

ATTN OF: Inspector General

SUBJECT: Report on Improving the Controls over EEO Contract Investigations

TO: Equal Employment Opportunity Director

An Office of Inspector General (OIG) audit team conducted a performance audit from July through September 1999 to evaluate the efficiency and effectiveness of the contract investigation process administered by the Counseling and Complaints Processing Division (CCPD) of GPO's Office of Equal Employment Opportunity (EEO). The audit was performed to determine whether CCPD was fulfilling its responsibilities of selecting contractors and reviewing the receipt of reports and related documentation.

The audit found that the CCPD was not fulfilling its duties in processing contract investigations in three areas, contrary to the requirements of EEOC Regulation 29 CFR Part 1614, GPO Instruction 825.18A, GPO's Blanket Purchase Agreement, and the Complaints Officer's position description. The CCPD Complaints Officer was not: (1) timely in assigning formal complaints to contract investigators; (2) timely in monitoring the completion of investigations; and, (3) always verifying the contract investigators' invoices for accuracy before forwarding the invoices to the Comptroller for payment.

The implementation of the eight audit recommendations would improve compliance with EEOC regulations and other applicable guidelines, and would provide management with opportunities to strengthen internal controls.

The Director, EEO, has agreed with the findings and recommendations and has begun implementing the eight recommendations.

Mr. Joseph Verch, Supervisory Auditor, and Ms. Michele Anderson, Auditor, conducted this audit.

00-04  
(317a)

**Page 2**

I appreciate the cooperation and courtesies extended during the audit by the officials and staff of the Office of Equal Employment Opportunity, the Materials Management Service, and the Office of Comptroller.

  
ROBERT G. ANDARY

**00-04  
(317a)**

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**REPORT ON IMPROVING THE CONTROLS  
OVER EEO CONTRACT INVESTIGATIONS**

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**U.S. Government Printing Office  
Office of the Inspector General  
Office of Audits**

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**REPORT ON IMPROVING THE CONTROLS  
OVER EEO CONTRACT INVESTIGATIONS**

**RESULTS IN BRIEF**

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The Counseling and Complaints Processing Division (CCPD) of GPO's Office of Equal Employment Opportunity (EEO) is responsible for the receipt, processing, and resolution of formal individual complaints of discrimination. GPO's Complaints Officer's additional responsibilities include being the Contracting Officer's Technical Representative and assigning investigations to commercial contract investigators; reviewing and analyzing completed investigative reports; and consulting with the Director, EEO concerning proposed dispositions. Thirty-three investigations were assigned to five contract investigators between April 14, 1997, and February 10, 1999.

From July through September 1999, GPO's Office of the Inspector General (OIG) conducted a performance audit to evaluate the efficiency and effectiveness of the contract investigation process within the formal complaint process administered by CCPD. The audit was performed to determine whether CCPD was fulfilling its responsibilities of selecting contractors, and reviewing investigative reports and related documentation.

The OIG audit found that the CCPD was not fulfilling its duties in processing contract investigations in three areas, contrary to the requirements of EEOC Regulation 29 CFR Part 1614, GPO Instruction 825.18A, GPO's Blanket Purchase Agreement, and the Complaints Officer's position description. The CCPD Complaints Officer was not: (1) timely in assigning formal complaints to contract investigators; (2) timely in monitoring the completion of investigations; and (3) always verifying the contract investigators' invoices for accuracy before forwarding the invoices to the Comptroller for payment.

Implementation of the eight audit recommendations would improve compliance with EEOC regulations and other applicable guidelines, and would provide management with opportunities to strengthen internal controls by assisting the EEO Director's efforts to:

- Develop and implement written internal controls to ensure the timely assignment of formal complaints to contract investigators;
- Monitor the completion of draft and final reports from contract investigators in a timely manner; and

- Develop and implement internal controls to ensure that contract investigator invoices are verified before being submitted to the Comptroller for payment.

Mr. Joseph Verch, Supervisory Auditor, and Ms. Michele Anderson, Auditor, conducted this audit.

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## BACKGROUND

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The Counseling and Complaints Processing Division (CCPD) of GPO's Office of Equal Employment Opportunity (EEO) is responsible for the receipt, processing, and resolution of formal individual complaints of discrimination on the grounds of race, color, religion, sex, age, physical or mental handicap, or national origin. Additional responsibilities include being the Contracting Officer's Technical Representative (COTR) and assigning investigations to commercial contractors; reviewing and analyzing completed investigative reports; and consulting with the Director, EEO concerning proposed dispositions. These responsibilities are stated in:

- GPO Instruction 650.1C *Equal Employment Opportunity and Affirmative Action Programs in the Government Printing Office*; and
- EEOC Regulations, 29 CFR Part 1614 *Federal Sector Equal Employment Opportunity*.

CCPD decided to use commercial contractors to conduct investigations, as permitted by the EEOC in its EEO Management Directive 110 *Federal Sector Complaints Processing Manual, in Chapter 4, paragraph IV(A)*:

“An agency may contract out an investigation or may arrange for another agency to conduct the investigation, but must remain responsible for the content and timeliness of the investigation.”

CCPD implemented a blanket purchase agreement (BPA) to provide a simplified method of filling the continual need for investigative services. BPAs are prepared and sent to prospective commercial contractors by the Contracting Officer, General Procurement Division. However, the commercial contractors' contact person within GPO is the COTR, who is the CCPD Complaints Officer. The Complaints Officer monitors the services performed by the commercial contractors under the BPA.

Currently, there are five commercial contractors who perform investigations for GPO. Under the terms of the BPA, the commercial contractors have 35 calendar days to complete an investigation and to submit a copy of the draft report to CCPD. The COTR has 10 calendar days to review the draft and request any modifications, at no added charge. After receiving any comments from the COTR, the commercial contractor has 10 calendar days to submit a final Report of Investigation to CCPD. CCPD then prepares an option letter informing the complainant of an option to a hearing or a final agency decision.





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## OBJECTIVE, SCOPE, AND METHODOLOGY

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The objective of this performance audit was to evaluate the efficiency and effectiveness of the contract investigations process within EEO's CCPD, including the selection of contractors and the receipt and review of investigative reports and related documentation.

On January 6, 1999, the Deputy Public Printer asked the Inspector General to conduct a complete audit of the Equal Employment Opportunity Program at GPO. Resulting audit work has been narrowed in scope to focus on the operation of the CCPD. On June 11, 1999, the OIG issued an interim report to alert GPO management of conditions requiring immediate corrective action to improve the processing of formal complaints.

As part of the ongoing audit requested by the Deputy Public Printer, the OIG conducted an evaluation of the contract investigations process within the area of formal complaints handled by CCPD. The auditors reviewed the 33 formal complaints assigned by the Complaints Officer from April 14, 1997, through February 10, 1999.

The audit included a review of the responsibilities of the Contracting Officer in the Materials Management Service General Procurement Division for awarding BPAs, and of the responsibilities of the Office of the Comptroller's General Examination and Support Section for processing vouchers for payments.

The audit was conducted during the period July through September 1999 in accordance with generally accepted Government auditing standards, and included such tests of the procedures, operations, and internal controls in place as were considered necessary under the circumstances.

We reviewed:

1. EEOC EEO Management Directive 110 *Federal Sector Complaints Processing Manual* to identify additional guidance related to the processing of employment discrimination complaints governed by EEOC Regulation 29 CFR Part 1614;
2. EEOC Regulations 29 CFR Part 1614 *Federal Sector Equal Employment Opportunity* to identify the laws and regulations governing the EEO Office;
3. Federal Acquisition Regulations Subpart 13.303 *Simplified Acquisition Procedure* to identify the regulations governing Blanket Purchase Agreements;
4. GPO Instruction 650.1C *Equal Employment Opportunity and Affirmative Action Programs in the Government Printing Office* to identify the policy and objectives of the EEO Office;

5. GPO Instruction 825.18A *Internal Control Program* to identify policies, standards, and assign responsibilities for conducting internal control reviews of GPO programs;
6. The current BPA, Requisition No. EEO-99, to identify the policies and administrative procedures for processing formal complaints in regards to contract investigators;
7. The selection process for choosing individual contractors for performing investigations;
8. A sampling of contractors' invoices and payments to verify the accuracy, to determine the aggregate amounts paid to each contract investigator, and to compare the prices charged by each contractor;
9. The procedures followed when contract investigators' actual expenses exceeded the allocated budget; and
10. Examples of written communications sent by the COTR to the Contracting Officer.

The OIG audit team interviewed appropriate management officials and staff of the Offices of Equal Employment Opportunity, the Materials Management Service, and the Office of the Comptroller.

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## FINDINGS AND RECOMMENDATIONS

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### 1. ASSIGNING FORMAL COMPLAINTS TO CONTRACT INVESTIGATORS

#### FINDING

While no specific time limits exist for assigning formal complaints to contract investigators, the assignment must be made with sufficient diligence to ensure that the investigation is finished within 180 days of the filing of the formal complaint. The audit found that the CCPD Complaints Officer was not timely in assigning formal complaints to contract investigators. A review of the 33 formal complaints assigned by the Complaints Officer from April 14, 1997, through February 10, 1999, found that 32 complaints were assigned from 4 months up to 47 months (3 years and 11 months) from the date the complaint was filed. (See Appendix 1.)

The untimeliness of the Complaints Officer in assigning formal complaints to contract investigators contributed to at least 31 of 33 formal complaints remaining open from 294 days to 1,854 days (3 years), as of May 19, 1999, contrary to the requirements of EEOC Regulations 29 CFR Part 1614. (See Appendix II.)

EEOC Regulations, at 29 CFR Part 1614.108(e), provide that:

“The agency shall complete its investigation within 180 days of the date of filing of an individual complaint . . . By written agreement within those time limits, the complainant and the respondent agency may voluntarily extend the time period for not more than an additional 90 days.”

In its comment on Part 1614 the EEOC explained the 180-day limit:

“We believe that agencies can complete investigations within 180 days and that agencies will have sufficient incentive to investigate complaints. The most recent federal sector statistics reported by the agencies to EEOC indicate that the average time it takes an individual complaint to reach the proposed disposition stage under part 1613 is 180 days or less in a majority of the agencies. Since under part 1614 the proposed disposition and informal adjustment are being eliminated from the agency process, agencies should be able to complete the investigation under part 1614 in the same amount of time it takes to reach the proposed disposition stage under part 1613. This indicates that the 180-day time frame can be met.”

The OIG audit found that 30 of the 33 formal complaints had already been pending for more than 180 days at the time the complaints were assigned to contract investigators. The Complaints Officer's noncompliance with the EEOC Regulations shows

- Documents all delays caused by the contract investigators in the EEO Investigation Tracking System and the contract investigators' files as required by the Blanket Purchase Agreement and GPO Instruction 825.18A (0004-04).

### **MANAGEMENT COMMENTS**

The Director, Office of Equal Employment Opportunity, agreed with the finding and the two recommendations. The CCPD will implement Recommendation 0004-03 fully within 120 days. In addition, the Director has already had preliminary meetings with the Material Management Service representative on the current language in the Blanket Purchase Agreement in implementing Recommendation 0004-04.



### 3. VERIFYING CONTRACT INVESTIGATORS' INVOICES

#### FINDING

The Complaints Officer (COTR) did not always verify the contract investigators' invoices for accuracy before forwarding the invoices to the Comptroller for payment, contrary to Standard 7 of GPO Instruction 825.18A.

"Transaction should be promptly recorded, properly classified, and accounted for in order to prepare timely accounts and reliable financial and other reports."

An OIG review of the 23 completed investigations that were assigned to contract investigators from April 14, 1997, to February 10, 1999, found the COTR incorrectly authorized payments in four investigations:

- Payments were authorized for the completion of Investigation #94-14 to two contract investigators (Richardson & Associates for \$2,250 on April 26, 1999, and National Employment for \$1,050 on May 1, 1995). National Employment completed Investigation #94-14, however, Richardson & Associates actually completed Investigation #94-10.
- The EEO Investigation Tracking System continues to show Investigation #94-10 as open despite the fact that the contractor has apparently been paid for the investigation.
- Payments were authorized for the completion of Investigations #97-07, #97-08, and #97-11 to National Employment, based upon the payment rates for the 1998 price lists, instead of the 1997 price lists when the investigations were assigned. This error resulted in an overpayment to National Employment of \$205.

Internal controls are needed to ensure that the COTR verifies the accuracy of the contract investigators' invoices before submitting the invoices to the Comptroller for payment. If the controls are not strengthened, these conditions are likely to continue and result in additional overpayments to contract investigators.

#### RECOMMENDATIONS

The Director, Office of Equal Employment Opportunity, should:

- Notify the Comptroller to recover the overpayment of \$205 to the contract investigator, National Employment (05);
- Develop and implement written procedures on resolving any future invoice discrepancies with the Comptroller (06);

- Develop and implement internal controls to ensure that the investigation number, contract investigator, price lists, and any other pertinent information are verified before submitting the contract investigator's invoice to the Comptroller for payment (07); and
- Update and maintain the EEO Investigation Tracking System to inform the Complaints Officer of the correct status of investigations when authorizing payment on a contract investigator's invoice (08).

### **MANAGEMENT COMMENTS**

The Director, Office of Equal Employment Opportunity, agreed with the finding and the four recommendations. The Director has forwarded a memorandum to the Comptroller to recover the overpayment of \$205 in Recommendation 0004-05.



**Investigations Assigned  
(April 14, 1997 – February 10, 1999)**

NO	Investigation No	Contract Investigator	Formal Complaint Date	Investigation Assigned Date	Time Took To Assign
1	95-11	Counter	06/06/95	02/10/99	3 yrs 8 mos
2	97-01	Counter	12/01/96	04/20/98	1 yr 4 mos
3	97-13	Counter	05/14/97	02/10/99	1 yr 9 mos
4	94-10	Danoff	05/18/94	04/15/97	2 yrs 11 mos
5	96-13	Danoff	06/29/96	02/10/99	2 yrs 8 mos
6	96-15	Danoff	08/05/96	02/10/99	2 yrs 6 mos
7	97-03	Danoff	01/30/97	02/10/99	2 yrs 1 mo
8	97-06	Danoff	03/03/97	04/20/98	1 yr 1 mo
9	95-10	Lanier	05/12/95	08/05/97	2 yrs 3 mos
10	95-13	Lanier	08/15/95	04/17/97	1 yr 8 mos
11	96-04	Lanier	09/09/95	04/15/98	2 yrs 7 mos
12	96-08	Lanier	04/19/96	04/15/98	2 yrs
13	96-09	Lanier	04/19/96	04/15/98	2 yrs
14	96-17	Lanier	09/09/96	11/18/97	1yr 2 mos
15	97-09	Lanier	04/05/97	02/10/99	1 yr 10 mos
16	97-10	Lanier	03/21/97	02/10/99	1yr 11 mos
17	98-01	Lanier	11/13/97	07/29/98	8 mos
18	98-02	Lanier	11/13/97	07/29/98	8 mos
19	93-43	National	08/15/93	04/14/97	3 yrs 8 mos
20	95-12	National	07/17/95	07/30/97	2 yrs
21	96-12	National	07/03/96	11/26/97	1 yr 5 mos
22	96-18	National	09/26/96	04/20/98	1 yr 7 mos
23	97-02	National	01/16/97	04/20/98	1 yr 3 mos
24	97-07	National	03/27/97	11/26/97	8 mos
25	97-08	National	02/26/97	11/26/97	9 mos
26	97-11	National	04/03/97	11/26/97	7 mos
27	98-03	National	12/30/97	02/10/99	1 yr 2 mos
28	98-04	National	12/30/97	02/10/99	1 yr 2 mos
29	98-06	National	01/26/98	07/29/98	6 mos
30	98-07	National	03/06/98	07/29/98	4 mos
31	98-11	National	07/28/98	07/29/98	1 day
32	94-10	Richardson	05/18/94	04/20/98	3 yrs 11 mos
33	94-13	Richardson	04/20/94	04/16/97	3 yrs

**Total Calendar Days Since Original Complaint Filed  
(For The Period Ending May 19, 1999)**

No.	Investigation No.	1994	1995	1996	1997	1998	1999	Total Days
1	93-43	138	365	366	365	365	138	1,737
2	94-10	227	365	366	365	365	138	1,826
3	94-10	227	365	366	365	365	138	1,826
4	94-13	255	365	366	365	365	138	1,854
5	95-10		233	366	365	181	0	1,145
6	95-11		208	366	365	365	138	1,442
7	95-12		167	366	365	365	138	1,401
8	95-13		138	366	365	365	138	1,372
9	96-04		113	366	365	365	138	1,347
10	96-08			256	365	365	138	1,124
11	96-09			256	365	365	138	1,124
12	96-12			181	365	365	138	1,049
13	96-13			185	365	365	138	1,053
14	96-15			148	365	365	138	1,016
15	96-17			113	365	365	138	981
16	96-18			96	365	365	138	964
17	97-01			30	365	365	138	898
18	97-02				349	296	0	645
19	97-03				336	365	138	839
20	97-06				303	365	138	806
21	96-07				279	365	138	782
22	97-08				308	365	138	811
23	97-09				270	365	138	773
24	97-10				285	365	138	788
25	97-11				272	365	138	775
26	97-13				231	365	138	734
27	98-01				48	365	138	551
28	98-02				48	365	138	551
29	98-03				1	365	138	504
30	98-04				1	365	138	504
31	98-06					339	138	477
32	98-07					300	138	438
33	98-11					156	138	294

**Total Calendar Days Contract Investigators Completed and Issued Final Report  
(As of August 10, 1999)**

No	Investigation No	Contract Investigator	Assigned Date	Draft Rec'd Date	Total Draft Days	Draft Return Date	Final Rec'd Date	Total Days
1	93-43	National	04-14-97	06-24-97	71	07-17-97	07-25-97	102
2	94-10	Danoff	04-15-97	10-28-97	196	Reassign		
3	94-10	Richardson	04-20-98	02-26-99	312	03-04-99	03-30-99	344
4	94-13	Richardson	04-16-97	08-07-97	113	08-20-97	09-24-97	161
5	95-10	Lanier	08-05-97	09-22-97	48	10-09-97	10-20-97	76
6	95-11	Counter	02-10-99					*
7	95-12	National	07-30-97	10-17-97	79	10-29-97	11-17-97	110
8	95-13	Lanier	04-17-97	05-30-97	43		06-10-97	54
9	96-04	Lanier	04-15-98	12-15-98	244		12-15-98	244
10	96-08	Lanier	04-15-98	06-16-98	62	08-20-98	08-26-98	133
11	96-09	Lanier	04-15-98	06-16-98	62	08-20-98	08-20-98	127
12	96-13	Danoff	02-10-99					*
13	96-15	Danoff	02-10-99					*
14	96-17	Lanier	11-18-97	03-04-98	106	03-20-98	04-16-98	149
15	96-18	National	04-20-98	06-15-98	56		06-15-98	56
16	97-01	Counter	04-20-98	07-30-98	101	07-31-98	01-31-99	286
17	97-02	National	04-20-98					*
18	97-03	Danoff	02-10-99					*
19	97-06	Danoff	04-20-98	06-25-98	66	08-19-98	09-07-98	140
20	97-07	National	11-26-97	03-05-98	99	03-10-98	03-20-98	114
21	97-08	National	11-26-97	03-05-98	99	03-10-98	03-20-98	114
22	97-09	Lanier	02-10-99					*
23	97-10	Lanier	02-10-99					*
24	97-11	National	11-26-97	03-05-98	99	03-10-98	03-20-98	114
25	97-12	National	11-26-97	03-05-98	99	03-10-98	03-20-98	114
26	97-13	Counter	02-10-99					*
27	98-01	Lanier	07-29-98	01-03-99	158		01-03-99	158
28	98-02	Lanier	07-29-98	01-03-99	158		01-03-99	158
29	98-03	National	02-10-99					*
30	98-04	National	02-10-99					*
31	98-06	National	07-29-98	02-09-99	195	04-21-99	04-29-99	274
32	98-07	National	07-29-98	02-09-99	195	04-21-99	04-29-99	274
33	98-11	National	07-29-98	12-15-98	139		12-15-98	139

\* Investigation not completed as of August 10, 1999.





UNITED STATES GOVERNMENT  
memorandum

**DATE:** March 28, 2000  
**REPLY TO**  
**ATTN OF:** Director, Equal Employment Opportunity  
**SUBJECT:** Draft Report on Improving the Controls over EEO Contract Investigations  
**TO:** Inspector General

This is in response to the above-listed draft report transmitted to me on March 22, 2000. The report evaluates the efficiency and effectiveness of the contract investigation process, and provides eight recommendations to improve compliance with regulations, and strengthen internal controls. The following comments, as numbered in the report, are provided:

**1. Assigning Formal Complaints to Contract Investigators:**

**Recommendations:**

The Director, Office of Equal Employment Opportunity (OEEO) should:

- ✓ Develop and implement written internal controls to ensure the timely assignment of formal complaints to contract investigators **(01)**; and
- ✓ Require regular reports from the CCPD on the status of all formal complaints to ensure the timely resolution of formal complaints as required by EEOC regulations, 29 CFR §1614 **(02)**.

**Management Comments:**

I agree that written internal controls must be developed to ensure the timely investigation of formal complaints. The Chief, CCPD and I both have the same philosophy about the importance of timely processing. Within 120 days, the Chief, CCPD will develop a mechanism and Standard Operating Procedure (SOP) to ensure complaints are investigated within the mandated timeframes. In addition, there will be a direct tie between the timely assignment of investigations and performance management issues.

*RGH*  
*3/30/00*

I also agree that regular reports from the CCPD are required. In fact, this recommendation has already been implemented as of October 1999. Reports are generated monthly, within 10 days after the close of the month.

## 2. **Monitoring Contract Investigators**

### Recommendations:

The Director, OEEC should ensure that the Complaints Officer:

- ✓ **Monitors the completion of draft and final reports by the contract investigators, and reviews draft reports in a timely manner (03); and**
- ✓ **Documents all delays caused by the contract investigators in the EEO Investigation Tracking System and the contract investigators' files as required by the Blanket Purchase Agreement and GPO instruction 825.18A (04).**

### Management Comments

I agree with the finding and recommendation. The CCPD will be responsible and held accountable for completing timely reviews of reports submitted by the contractors. They will monitor the contractors with regard to the timely submission of draft and final ROIs. This recommendation will be implemented fully within 120 days. We are currently operating with staff shortages. However, once we fill our vacant position in the CCPD, we will be able to monitor the contractors performance more closely.

The CCPD will require that contractors document all delays experienced in the completion of the investigations for inclusion in the files. We have already had preliminary meetings with the Materials Management Service representative so that we have a clearer understanding of their role and responsibility, and have discussed our desire to modify the current language in the Blanket Purchase Agreement to put more responsibility on the contractor to document any delays caused by the agency. If after 90 days the CCPD believes that GPO personnel are the reasons for the delays, I will be apprised so that the matter can be resolved.

## 3. **Verifying Contract Investigators' Invoices**

### Recommendations:

- ✓ **Notify the Comptroller to recover the overpayment of \$205 to the contract investigator, National Employment (05).**

PAGE 3

- ✓ Develop and implement written procedures on resolving any future invoice discrepancies with the Comptroller **(06)**.
- ✓ Develop and implement internal controls to ensure that the investigation number, contractor investigator, price lists, and any other pertinent information are verified before submitting the contract investigator's invoice to the Comptroller for payment **(07)**; and
- ✓ Update and maintain the EEO Investigation Tracking System to inform the Complaints Officer of the correct status of investigations when authorizing payment on a contract investigator's invoice **(08)**.

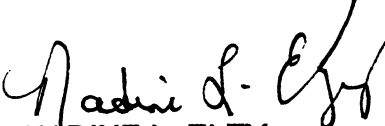
**Management Comments:**

I agree with the findings and recommendations regarding the need to verify contract investigators' invoices. In addition, I have forwarded a memorandum to the Comptroller so that efforts can be made to recover the overpayment made to National Employment Practices in the amount of two hundred five dollars (\$205.00).

Written procedures will be prepared and enforced, to ensure that the amounts approved for payment by the CCPD have first been verified. Once again, all matters regarding compliance and/or implemented by the CCPD, will be directly tied to performance management. However, the EEO Office can not be held accountable for payments that are authorized without our concurrence and/or approval.

The EEO Investigation Tracking system will be maintained with up-to-date information on the status of investigations from assignment through completion.

Thank you for providing me the opportunity to comment on your recommendations. If you have any questions or concerns regarding my comments, please contact me at 512-2014.

  
NADINE L. ELZY

